

## Gayatri Vasani - Cross

1 State.

2 CROSS-EXAMINATION

3 BY MS. DAABOUL:

4 Q. Ms. Vasani, you testified to a lot of things, so there are  
5 lots of things that we aren't going to cover. But we will  
6 touch on some of your earlier testimony to sort of clarify what  
7 it is that you testified to.

8 Earlier you testified that you were subpoenaed to appear  
9 here today, correct?

10 A. Correct.

11 Q. Who subpoenaed you?

12 A. The plaintiffs.

13 Q. Now, let's just talk about the nature of the project that  
14 you were assigned to work on for the Secretary of State. Can  
15 you tell me briefly about what the project entailed?

16 A. So I knew about this project when my boss cc'd me on an  
17 email saying, I'm assigning Gayatri as a business analyst.

18 Q. And that was Rebekah Hibbs, correct?

19 A. That was Rebekah Hibbs.

20 And basically, that email had a data extract. And it --  
21 and SOS had asked us to remove a couple of fields and add  
22 lawful presence-related fields like U.S. citizenship flag, yes,  
23 no, unknown, and lawful presence equals yes is what I think  
24 they said.

25 Q. Let me stop you there. What does "lawful presence equals

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1 yes" mean?

2 A. It means nothing, because we don't have a lawful presence  
3 field equals yes.

4 Q. Okay.

5 A. But that's what they requested.

6 Q. Were there other parameters that they gave you?

7 A. They gave an extract from another file that we sent them,  
8 like -- and they said, We'll keep all these fields. Just add  
9 lawful presence status equals yes and citizenship equals yes,  
10 no, unknown to it. And that's all they needed.

11 Q. Okay. What does "citizenship equals yes" mean?

12 A. It means that the person is a U.S. citizen at the time of  
13 the last driver's license transaction.

14 Q. Okay. And what does "citizenship equals no" mean?

15 A. That they were not a citizen at the last DL transaction.

16 Q. Okay. And what does "citizenship equals unknown" mean?

17 A. We don't know if the person is a citizen or not.

18 Q. Okay. So you received these parameters from the Secretary  
19 of State's office. Then what happened?

20 A. My boss wanted to call them to confirm what they needed.

21 So we had a phonecall, and my boss spoke to SOS. And they  
22 wanted us to confirm citizenship on records that we send them.  
23 My boss told them that DPS is not an authorizing agency to  
24 confirm citizenship. We do collect citizenship information at  
25 the time of the transaction, but that may not be current

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1 because when you come in for the driver's license, you get a  
2 driver's license for six years, right? We may not have the  
3 current citizenship information.

4 And my boss asked SOS that they should -- I mean, she  
5 suggested they should go directly to DHS if they want current  
6 citizenship information.

7 Q. So earlier you testified that you turned over data to the  
8 Secretary of State's office. And you said that was in April,  
9 correct?

10 A. Yes.

11 Q. Okay. Before you had turned over that first batch of data  
12 in April, was there discussion about refining the -- I guess  
13 the query further?

14 A. Yes. So just before we sent them the data, they had  
15 asked -- that's the email we read. He did ask for lawful  
16 presence fields to be added to the -- to the query. But I  
17 checked with IT. We didn't have the bandwidth to do that till  
18 October because we were -- we had back-to-back projects in our  
19 pipeline.

20 Q. Did DPS end up working on this project prior to October?

21 A. Yes, we did.

22 Q. Okay. And why was that?

23 A. Because we received an email from chain of command to  
24 prioritize this higher. And so we started working on it in  
25 August.

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1 Q. Okay.

2 A. September.

3 Q. Now, there's been a lot of discussion about this SAVE  
4 database and how it communicates and how it doesn't  
5 communicate. And I just want to have the record clarified with  
6 respect to the SAVE database. Okay?

7 Earlier there was testimony regarding the Secretary of  
8 State's office bringing up this possibility of running records  
9 through the SAVE database. And counsel put some emails in  
10 front of you and ran through the emails where the SOS was  
11 asking, Can we run these records through the SAVE database?

12 What was the outcome of that question? Is DPS able to run  
13 records through the SAVE database?

14 A. So when we received that email, SOS was saying that they  
15 were going to run it against the SAVE database. But later on,  
16 chain of command, like Deputy Director Hearn, asked us -- asked  
17 chief and assistant chief if, hypothetically, SOS were to send  
18 us records, could we run it through the SAVE database?

19 And my boss replied, It's a manual process, needs  
20 resources. But the contract that we have with DHS doesn't  
21 allow us to run records like that outside of a DL issuance  
22 process.

23 Q. Okay. So DPS was not able to run records through the SAVE  
24 database?

25 A. That's correct.

## Gayatri Vasani - Redirect

1 Q. So earlier you were talking about the lawful presence  
2 status field, correct?

3 A. Yes.

4 Q. Okay. Well, let me jump to something else.

5 A. Okay.

6 Q. Earlier it was mentioned there was a weekly file that was  
7 going to be produced, and you testified that that was never  
8 produced, correct?

9 A. Correct.

10 Q. Why was that never produced?

11 A. I don't know.

12 Q. Okay. Were further discussions had regarding the weekly  
13 file that would be produced?

14 A. No.

15 MS. DAABOUL: No further questions.

16 THE COURT: Redirect.

17 REDIRECT EXAMINATION

18 BY MR. GABER:

19 Q. Ms. Vasani, just a few questions. When your boss -- or I  
20 forget who you said it was. I think you said your boss told  
21 the Secretary of State -- or who told -- who was it that told  
22 the Secretary of State that they should go directly to DHS if  
23 they wanted current citizenship data?

24 A. My boss, Rebekah Hibbs.

25 Q. Rebekah Hibbs.